

RESPONSE TO YORK HOSPITALS WRITTEN COMMENTS REGARDING MAINE MEDICAL CENTERS CERTIFICATE OF NEED APPLICATION TO BUILD AN AMBULATORY SURGICAL FACILITY

*I noted in the Maine Medical Center application, all of York County is considered part of Maine Medical Center's primary service area based on the medical center having a 28 percent "market share" in that county. Perhaps in a county as diverse and served by as many hospitals as York County, service area should be defined by town. Clearly, northern York County towns are much more likely to be primarily served by Maine Medical Center than southern York County towns. Bearing in mind that several York County towns are in much closer proximity to New Hampshire hospitals than Portland based Maine Medical Center. New Hampshire hospital services to Maine residents might also be taken into consideration in this calculation. As with my questions about the Southern Maine Medical Center proposal analysis, I am not expressing opposition to the Maine Medical Center application. My concern here, again, is the criteria and definition of service area and how they may be used to determine the appropriateness and feasibility of services.*

CONU Response:

We agree with York Hospital's concerns. The concept of a hospital service area was developed over two decades ago when hospital services were almost entirely inpatient. This measure excludes consideration of tertiary care, newborn care and outpatient admissions that are now a large part of hospital services. In the absence of meaningful criteria for defining a hospital's service area CONU is unable to refute MMC's assertions regarding its primary and secondary service area. This data was provided for informational purposes only. We looked at actual utilization data to complete our analysis.